

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**CASE NO: 24-CR-20051-MARTINEZ**

**UNITED STATES,**

**v.**

**ALFRED DAVIS,**

**Defendant.**

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**UNITED STATES' RESPONSE TO THE DEFENDANT'S OBJECTIONS TO THE PSI**

The United States of America hereby files this Response to the Defendant Alfred Davis' Objections to the Presentence Investigation Report ("PSI"). ECF No. 65.

**ALFRED C. DAVIS**

If the Defendant admits that he is not Alfred C. Davis, ECF No. 65 ¶ 1, then he must admit that he is not the founder of Blackfire Transport LLC, which he purports to be. *See* PSI ¶ 67. Blackfire Transport was registered in the State of Florida by Alfred C. Davis, who lived in Virginia, on July 12, 2017. *See* Fla. Dep't of State, *SunBiz*, L17000156742, Ex. A. Blackfire Transport went inactive until a reinstatement was filed on January 2, 2020, by the Defendant. *See* Fla. Dep't of State, *SunBiz*, L17000156742 (Jan. 2, 2020). The Defendant chose Blackfire Transport as the target of a takeover fraud because the actual owner's name was the same as the Defendant's, except for the middle initial, a difference which would go unnoticed. By fraudulently assuming Blackfire Transport, the company appeared to have history and continuity of ownership. In reality, Blackfire Transport is a shell company which the Defendant used to open bank accounts and take out credit lines. One such credit line, for example, allowed him to purchase his 2021 Land Rover Defender. PSI ¶ 83. Blackfire Transport is not a logistics company. PSI ¶ 67.

**OFFENSE CONDUCT**

The Defendant objects generally to the Offense Conduct portion of the PSI. The Defendant's offense was proven at trial. These objections should be overruled.

Respectfully submitted,

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UNITED STATES ATTORNEY

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